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## **RE: FCC 11-109 LightSquared GPS comments**

As the Chief Technology Officer for Sportvision Inc., I and my Chief Scientist submit the following for your consideration with respect to LightSquared's use of near-GPS and GPS Spectrum.

Sportvision is the Data Acquisition and Broadcast partner of the NASCAR® series and has revolutionized the broadcast of these, and other, motorsports events through real-time visual enhancement of the broadcast stream. We hold patents in combining RTK(Real-Time Kinematics)/GPS position, Camera fields of view and other specialized instrumentation for real-time tracking at high-precision and speed.

The precision and robustness of our telemetry products is crucial for the success of our partners and customers and Sportvision most importantly because it will negatively affect the broadcast audiences and enjoyment of motorsports fans worldwide. NASCAR, Indycar, GrandAm and other motorsports events rely on our intellectual property and inventions to provide the greatest experience to their viewers at home each week from venues across the United States and Canada. Race cars and other objects are tracked to a precision of 2cm in order to enhance the TV broadcasts and facilitate officiation.

With substantial intellectual property and products based on GPS, I have read and understood the lengthy final report from the LightSquared and GPS Industry working group. Moreover, we have compared our findings with partners; scientists and technology providers who have great depth in GPS and its related technologies and have established an opinion regarding the sum of findings.

Based on our collective findings we are convinced that if LightSquared installs cell towers within several miles of any of our venues of operation, the RTK/GPS tracking system will become inoperable. This will be tragic for the Motorsports industry and for Sportvision and negatively impact the public. In our view, and that of our partners, it would be deeply embarrassing for our country if the GPS system that we have pioneered becomes marginalized by the narrow interests of any party.

The implications are more far-reaching. We, like others, are concerned with the safety implications of degrading the performance of GPS anywhere in America. The consequences for Agriculture, Public Safety (Fire, Police, Rescue), Marine Navigation, and Air Transportation are dire. All have become dependent on GPS for safety. We are aware that the United States Coast Guard has similar concerns about the LightSquared system having adverse effects on their operations in coastal waters.

While we acknowledge that there are commercial benefits to using spectrum for communications and broadband access, we submit that the negative safety and economic consequences of interfering with GPS far outweigh any potential commercial benefits. LightSquared should not be allowed to operate using spectrum, and at power levels, that will adversely affect the performance of GPS.

Regards,

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Chief Technology Officer

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Chief Scientist

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